

FILED

OCT 24 2016

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA, )  
 )  
 ) Plaintiff, )  
 )  
 v. ) No. S1 4:15 CR 00373 AGF  
 )  
 CARRON PRIMUS, )  
 a/k/a "Carron Bell" )  
 )  
 )  
 ) Defendant. )  
 )

**SUPERSEDING INFORMATION**

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT ONE**

Between June 1, 2015 and continuing through on or about July 31, 2015, within St. Louis County, in the Eastern District of Missouri,

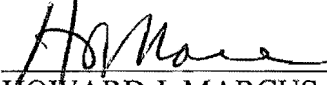
**CARRON PRIMUS**  
**a/k/a "Carron Bell"**

the defendant herein, did knowingly use the facilities of interstate commerce, to wit: the internet and cellular phones, with intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on an unlawful activity, to wit: prostitution and thereafter did in fact promote and manage the crime of prostitution.

In violation of Title 18 USC Section 1952(a).

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

  
HOWARD J. MARCUS, 29756MO  
Assistant United States Attorney  
111 South 10th Street, Room 20.333  
St. Louis, Missouri 63102  
(314) 539-2200

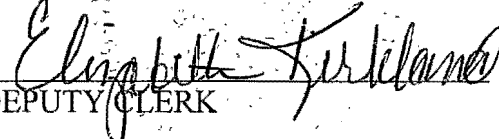
UNITED STATES OF AMERICA       )  
EASTERN DIVISION                )  
EASTERN DISTRICT OF MISSOURI   )

I, Howard J. Marcus, Assistant United States Attorney for the Eastern District of  
Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

  
HOWARD J. MARCUS, 29756MO

Subscribed and sworn to before me this 18<sup>th</sup> day of October 2016.

  
CLERK, U.S. DISTRICT COURT

By:   
DEPUTY CLERK